

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

BUFFALO PATENTS, LLC,	§	
	§	
Plaintiff,	§	
	§	
v.	§	CIVIL ACTION NO. 6:21-cv-1065-ADA
	§	
ZTE CORPORATION,	§	
	§	
Defendant.	§	
	§	

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**NOTICE OF SPECIAL APPEARANCE AND AGREED EXTENSION OF TIME TO  
MOVE, ANSWER, OR OTHERWISE RESPOND TO PLAINTIFF’S COMPLAINT**

In accordance with the Court’s standing Order signed the 11<sup>th</sup> day of August 2021, ZTE Corporation (“ZTC”) notifies the Court that Plaintiff Buffalo Patents, LLC (“Buffalo Patents”) agreed to another 30-day extension of time for ZTC to answer, move, or otherwise respond to Buffalo Patents’ Complaint. This request is unopposed; does not change the date for any hearing, final submission to the Court related to a hearing, or trial; and does not waive any defenses described or referred to in FED. R. CIV. P. 12.

WHEREFORE, ZTC respectfully requests the Court allow another 30 days for ZTC to answer, move, or otherwise respond to Buffalo Patents’ Complaint, extending the deadline to January 19, 2022. The undersigned specially appears for the sole purpose of seeking this unopposed extension of time for ZTC to answer, move, or otherwise respond to the Complaint.

DATED: December 16, 2021

Respectfully submitted,

/s/ Everett Upshaw

Everett Upshaw

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*Counsel for ZTE Corporation  
for the limited purpose of seeking  
this unopposed extension of time*

**CERTIFICATE OF CONFERENCE**

By telephone, Zachariah S. Harrington, counsel for Buffalo Patents, advised that Buffalo Patents does not oppose the foregoing request for extension.

/s/ Everett Upshaw

Everett Upshaw

**CERTIFICATE OF SERVICE**

I hereby certify that on this 16<sup>th</sup> day of December, 2021, a true and correct copy of the foregoing was filed with the Clerk of Court using the CM/ECF system, which forwards electronic notification of such filing to all counsel of record.

/s/ Everett Upshaw

Everett Upshaw